

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 1:20-cv-11976

BETH DONOVAN,  
Plaintiff,

v.

CITY OF BOSSTON,  
Defendant.

**NOTICE OF REMOVAL**  
**(PURSUANT TO 28 U.S.C. § 1441)**

The Defendant City of Boston (“the Defendant”) through undersigned counsel, hereby gives notice of the removal of this action pursuant to 28 U.S.C. §§ 1441 and 1446 from the Suffolk Superior Court, where this action is currently pending. In Suffolk Superior Court, the case is docketed as Civil Action No. 2020-01712A and has the same caption as above.

In support of this Notice of Removal, the Defendants state as follows:

1. This action, brought pursuant to Title VII (42 U.S.C § 2000e et seq.), alleges *inter alia* that the Defendant discriminated and retaliated against Plaintiff. Specifically, the Plaintiff alleges *inter alia* that her civil rights were violated as a result of the Defendant discriminating against her on the basis of gender and retaliating against her for engaging in protected activity. See Plaintiff’s Complaint, ¶ 76-83 attached hereto as **Exhibit 1**. Plaintiff seeks damages for lost wages, emotional distress, costs of the action, attorney’s fees and further relief. See **Exhibit 1**.
2. This Court has jurisdiction over the Plaintiff’s federal claims pursuant to 28 U.S.C. § 1331, and the entire action may be removed pursuant to 28 U.S.C. § 1441(c).

3. A fair reading of the facts and theories as a whole makes it apparent that federal law and issues are essential to this case and therefore the Defendants have a statutory right to remove this action.
4. Defendant's Notice of Removal has been filed within thirty (30) days from service of the Plaintiff's complaint upon them on October 19, 2020. See Plaintiff's Cover Letter and Summons regarding service, attached hereto as **Exhibit 1**.

Respectfully submitted,  
DEFENDANT  
CITY OF BOSTON

By its attorney,  
Eugene L. O'Flaherty  
Corporation Counsel

/s/ Erika P. Reis  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the Plaintiff via first class mail.

11/2/2020  
Date

/s/ Erika P. Reis  
Erika P. Reis